

Our File No. 41,101-N
Rothbard, Rothbard, Kohn & Kellar
50 Park Place, Suite 1228
Newark, NJ 07102
(973) 622-7713
lawyers@rrkklaw.com
James F. Vislosky, Jr. 009201988
Attorneys for Debtors

In Re	:	UNITED STATES BANKRUPTCY COURT
	:	DISTRICT OF NEW JERSEY
Gaudia E. Spence and	:	CHAPTER 13
Rowan Bowen	:	
	:	CASE NO. 19-19601-SLM
	:	
Debtors	:	NOTICE OF MOTION TO
	:	REINSTATE AUTOMATIC STAY
	:	
	:	Hearing Date August 26, 2020
	:	
	:	Judge: Meisel

Marie-Ann Greenberg
30 Two Bridges Road; Suite 330
Fairfield, NJ 07004

US TRUSTEE
Office of the US Trustee
One Newark Center, Suite 2100
Newark, NJ 07102

KML Law Group, P.C.
216 Haddon Avenue, Ste. 406
Westmont, NJ 08108

PLEASE TAKE NOTICE THAT the undersigned attorneys for debtor, will apply to the United State Bankruptcy Court, located at 50 Walnut Street, 3rd Floor, Newark, NJ 07102, Courtroom 3A, for an order reinstating the automatic stay as to secured creditor Specialized Loan Servicing LLC.

Take further notice that on the return date of this motion, the moving party shall rely upon the annexed certifications. No brief is necessary as there are no disputed legal issues.

Pursuant to local rule DNJ LBR 9013-1, this motion shall be deemed uncontested unless responding papers are filed with the Clerk of the U.S. Bankruptcy Court and served upon the moving party seven days in advance of the scheduled hearing date stating with particularity the basis of the opposition. Unless notified to the contrary, motions deemed uncontested will be decided on the moving papers and no appearance will be required by the moving party unless directed by the court.

A proposed form of order is annexed.

Rothbard, Rothbard, Kohn & Kellar
Attorneys for Debtor

Date: July 23, 2020

By: /s/ James F. Vislosky, Jr.